

Ryan T. Gormley, Esq.  
[rgormley@wwhgd.com](mailto:rgormley@wwhgd.com)  
Nevada Bar No. 13494  
WEINBERG, WHEELER, HUDGINS,  
GUNN & DIAL, LLC  
6385 South Rainbow Blvd., Suite 400  
Las Vegas, Nevada 89118  
Tel: (702) 938-3838  
*Local Counsel for*  
*Plaintiff, Ernest Bock, L.L.C.*

John F. Palladino, Esq.  
[john@hankinsandman.com](mailto:john@hankinsandman.com)  
Evan M. Labov, Esq.  
[evanl@hankinsandman.com](mailto:evanl@hankinsandman.com)  
HANKIN SANDMAN PALLADINO  
WEINTROB & BELL, P.C.  
30 South New York Avenue  
Atlantic City, NJ 08401  
Tel: (609) 344-5161  
*Pro Hac Counsel for*  
*Plaintiff, Ernest Bock, L.L.C.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**ERNEST BOCK, L.L.C.,**

**Plaintiff,**

**v.**

**PAUL STEELMAN, individually;  
MARYANN STEELMAN, individually;  
PAUL STEELMAN, as trustee of the  
Steelman Asset Protection Trust;  
MARYANN STEELMAN, as trustee of the  
Steelman Asset Protection Trust; JIM  
MAIN, as trustee of the Steelman Asset  
Protection Trust; STEPHEN STEELMAN;  
SUZANNE STEELMAN TAYLOR; PAUL  
STEELMAN, as trustee of the Paul C.  
Steelman and Maryann T. Steelman  
Revocable Living Trust; MARYANN  
STEELMAN, as trustee of the Paul C.  
Steelman and Maryann T. Steelman  
Revocable Living Trust; PAUL  
STEELMAN, as the trustee of the Paul  
Steelman Gaming Asset Protection Trust;  
KEEPSAKE, INC.; SMMR, LLC; SMMR,  
LLC SERIES A-Z; SSSSS, LLC; SSSSS,  
LLC, SERIES B; CHRISTIANA, LLC;  
CHRISTIANA, LLC, SERIES A-Z;  
COMPETITION INTERACTIVE, LLC;  
PAUL STEELMAN, LTD.; STEELMAN  
PARTNERS, LLP; PAUL STEELMAN  
DESIGN GROUP, INC.; SAPT**

**CASE NO.: 2:19-cv-01065-JAD-EJY**

**STIPULATION EXTENDING BRIEFING  
SCHEDULE ON MOTION FOR  
PARTIAL JUDGMENT ON THE  
PLEADINGS AND TO DISMISS  
COMPLAINT  
(FIRST REQUEST)**

**[ECF No. 280]**

**HOLDINGS, LLC, SERIES B; AARON  
SQUIRES; and MATTHEW MAHANEY,**

**Defendants.**

Plaintiff Ernest Bock, L.L.C. (“Bock”), through the law firm of Hankin Sandman Palladino Weintrob & Bell, P.C., and Defendants Paul Steelman, Maryann Steelman, Paul Steelman as the trustee of the Steelman Asset Protection Trust, Maryann Steelman as the trustee of the Steelman Asset Protection Trust; Stephen Steelman, Suzanne Steelman Taylor, Paul Steelman as the trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust, Maryann Steelman as the trustee of the Paul C. Steelman and Maryann T. Steelman Revocable Living Trust; Paul Steelman as the trustee of the Paul Steelman Gaming Asset Protection Trust (collectively, the “Steelman Parties”), through the law firm of Brownstein Hyatt Farber Schreck; Defendants Christiania, LLC, Christiania, LLC, Series A-Z, Competition Interactive, LLC, Keepsake, Inc., Paul Steelman Design Group, Inc., Paul Steelman, Ltd., SAPT Holdings, LLC, Series B, SMMR, LLC, SMMR, LLC, Series A-Z, SSSSS, LLC, SSSSS, LLC, Series B, and Steelman Partners, LLP (collectively, the “Corporate Defendants”), through the law firm of Greenberg Traurig, LLP submit this Stipulation (the “Stipulation”); and Defendant Matthew Mahaney (“Mahaney”), through the law firm of Solomon Dwiggin Freer & Steadman, LTD., hereby stipulate, subject to this Court’s approval, to continue the briefing deadlines relating to the Steelman Parties’ Motion to Enter Partial Judgment on the Pleadings and to Dismiss Complaint (Doc. 274) and Corporate Defendants and Mahaney’s Joinders of same (Doc. 278 and Doc. 279) for a period of fourteen (14) days. The deadlines are currently set as follows: Response deadline of Friday, October 25, 2024, and a Reply deadline of Friday, November 1, 2024. The parties are requesting deadlines set as

follows: Response Deadline of Friday, November 8, 2024, and a Reply deadline of Friday, November 15, 2024. This is the parties' first request to extend these deadlines.

The schedules of Bock's counsel in a number of pending matters severely limits their time to prepare a response to the Motion and Joinders, which seek dismissal of important aspects of Plaintiff's Fourth Amended Complaint. Among other matters: Plaintiff's reply in support of their Motion to Compel (Doc. 269) is due on October 18<sup>th</sup>; a two-full-day hearing is set for October 22<sup>nd</sup> and 23<sup>rd</sup> in the New Jersey matter between Bock and certain Steelman Defendants (New Jersey Superior Court, ATL-2294-15), which will also require preparation time; counsel has a brief in opposition to cross-motion due in another matter on October 18<sup>th</sup>; and counsel has a motion for reconsideration that must be filed by October 22<sup>nd</sup> in another matter.

Based on the foregoing, the parties respectfully request that the Court grant the stipulation and approve the deadlines outlined herein.

**HANKIN, SANDMAN, PALLADINO,  
WEINTROB & BELL, P.C.**

BY: Evan M. Labov  
EVAN M. LABOV, ESQ. (*pro hac vice*)  
evanl@hankinsandman.com  
30 South New York Avenue  
Atlantic City, NJ 08401  
*Pro-Hac Counsel for Plaintiff*  
DATED: 10/16/2024

**SOLOMON DWIGGINS FREER &  
STEADMAN, LTD.**

BY: Jeffrey P. Luszeck  
JEFFREY P. LUSZECK, ESQ., #9619  
jluszeck@sdfnlaw.com  
9060 West Cheyenne Avenue  
Las Vegas, NV 89129  
*Attorney for the Professional Defendants*  
DATED: 10/16/2024

**GREENBERG TRAURIG, LLP**

BY: Joel E. Tasca

JOEL E. TASCA

joel.tasca@gtlaw.com

10845 Griffith Peak Drive, Suite 600

Las Vegas, NV 89135

*Attorney for the Corporate Defendants*

DATED: 10/16/2024

**BROWNSTEIN HYATT FARBER**

**SCHRECK, LLP**

BY: Frank M. Flansburg

FRANK M. FLANSBURG III, ESQ., #6974

fflansburg@bhfs.com

100 North City Parkway, Suite 1600 Las

Vegas, NV 89106-4614

*Attorneys for the Steelman Defendants*

DATED: 10/16/2024

**ORDER**

Based on the parties' stipulation [**ECF No. 280**] and with good cause appearing, the deadline to respond to the defendants' motion for judgment [ECF No. 274] is extended to **November 8, 2024**. The reply is due **November 15, 2024**.

  
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U.S. District Judge Jennifer A. Dorsey  
October 16, 2024